

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GATEGUARD, INC.

Plaintiff,

v.

Civil Action No. 21-cv-9321 (JGK) (VF)

AMAZON.COM, INC.,
AMAZON.COM SERVICES, INC.,
AMAZON.COM SERVICES, LLC,
AMAZON LOGISTICS, INC.

Defendants.

I, Eden P. Quainton, swear under penalty of perjury that the following is true and correct:

1. I am counsel for Plaintiff GateGuard, Inc. (“GateGuard” or the “Company”).
2. Set forth as Exhibit A hereto is a true and accurate copy of an internal Amazon email exchange, together with a letter and accompanying exhibits from GateGuard’s former attorney, Ariel Reinitz, notifying Amazon of its unlawful tampering with GateGuard intercom devices.
3. Set forth as Exhibits B and C hereto are true and accurate copies of internal Amazon communications relating to a videoconference between Ari Teman (“Mr. Teman”), GateGuard’s former Chief Executive Officer, and certain Amazon Key for Business executives.
4. Set forth as Exhibit D, E and F hereto are true and accurate copies of Amazon communications from November 10, 2020.
5. Set forth as Exhibit G hereto is a true and accurate extract from the deposition of Gerry Nievera.

6. Set forth as Exhibit H hereto is a true and accurate extract from the deposition of Christopher Berrett.

7. Set forth as Exhibit I hereto is a true and accurate copy of an email exchange involving Christopher Berrett, Alex Aguilar and Derek Stephenson.

8. Set forth as Exhibit Ia is a true and accurate extract from the deposition of Christopher Berrett.

9. Set forth as Exhibit Ib is a true and accurate extract from the deposition of Alex Aguilar.

10. Set forth as Exhibit J hereto is a true and accurate copy extract from the deposition of Christopher Berrett.

11. Set forth as Exhibit K hereto is a true and accurate extract from the deposition of Christopher Berrett.

12. Set forth as Exhibit L hereto is a true and accurate copy of an email exchange between Christopher Berrett and Derek Stephenson.

13. Set forth as Exhibit M hereto is a true and accurate extract from the deposition of Gerry Nievera.

14. Set forth as Exhibit N hereto is a true and accurate extract from the deposition of Gerry Nievera.

15. Set forth as Exhibit O hereto is a true and accurate copy of a “Chime” exchange between Gerry Nievera and Paul Donovan.

16. Set forth as Exhibit P hereto is a true and accurate extract from the deposition of Christopher Berrett.

17. Set forth as Exhibit Q is a true and accurate extract from the deposition of Gerry Nievera.

18. Set forth as Exhibit R hereto is a true and accurate copy of Amazon's Responses and Objections to GateGuard's Third Request for the Production of Documents.

19. Set forth as Exhibit S hereto is a true and accurate extract from the deposition of Paul Donovan.

20. Set forth as Exhibit T hereto is a true and accurate extract from the deposition of Alex Aguilar.

21. Set forth as Exhibit U hereto is a true and accurate extract from the deposition of Dustin Keller.

22. Set forth as Exhibit V hereto is a true and accurate extract from the deposition of Christopher Berrett.

23. Set forth as Exhibit W hereto is a true and accurate extract from the deposition of Gerry Nievera.

24. Set forth as Exhibit X hereto is a true and accurate copy of an email from Paul Jessop of ClearHome, dated November 16, 2021.

25. Set forth as Exhibit Y hereto is a true and accurate copy of an email from David Salant to Eden P. Quainton, dated March 1, 2024.

26. Set forth as Exhibit Z hereto is a true and accurate set of extracts from Amazon's March 26, 2024 production of legible documents showing continuous installations of the Key for Business at GateGuard locations from late 2020 into 2023.

Dated: New York, NY
March 27, 2024

Eden Quainton

EDEN P. QUAINTON